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UNITED STATES DISTRICT COURT

for the

Western District of Washington

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY
BY

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)Four premises and a vehicle, more fully described in
Attachments A-1, A-2, A-3, A-4 and A-5

Case No.

MJ19-311

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Four premises and a vehicle, more fully described in Attachments A-1, A-2, A-3, A-4 and A-5

located in the _____ Western _____ District of _____ Washington _____, there is now concealed (identify the person or describe the property to be seized):

See Attachment B for a List of Items to be Seized.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

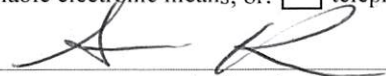
Offense Description

18 U.S.C. §§ 2314, 2315, 371,
and 1956Interstate Transportation in Stolen Goods, Sale of Stolen Goods in Interstate Commerce,
Conspiracy to Commit these Offenses, and Money Laundering

The application is based on these facts:

- ☒ See Affidavit of Special Agent Ariana Kroshinsky, continued on the attached sheet.

- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested
under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☐ by reliable electronic means; or: ☐ telephonically recorded.


Applicant's signature

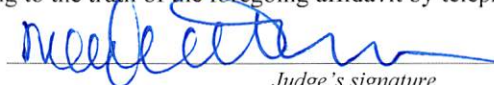
Ariana Kroshinsky, Special Agent FBI

Printed name and title

- ☒ The foregoing affidavit was sworn to before me and signed in my presence, or
☐ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date:

July 8, 2019



Judge's signature

City and state: Seattle, Washington

Mary Alice Theiler, United States Magistrate Judge

Printed name and title

AFFIDAVIT

1 STATE OF WASHINGTON)
 2) ss
 3 COUNTY OF KING)
 4

5 I, Ariana Kroshinsky, having been duly sworn, state as follows:

I. INTRODUCTION**A. Background**

7
 8 1. This affidavit is made in support of applications for warrants to search the
 9 locations specified below, for evidence of the crimes of interstate transportation in stolen
 10 goods, sale of stolen goods in interstate commerce, conspiracy to commit these offenses,
 11 and money laundering, in violation of 18 U.S.C. § 2314, 2315, 371, and 1956. The
 12 centers of this criminal activity are two pawn shops, INNOVATION BEST and THRIFT
 13 ELECTRO, located in Kent and Renton, Washington (respectively), and a
 14 warehouse/office space in Kent.

15 2. I am a Special Agent with the Federal Bureau of Investigation (FBI), and
 16 have been since January 2018. I am currently assigned to the Seattle Field Office, to a
 17 squad that covers transnational organized crime with ties to the Eastern Hemisphere. My
 18 training and experience includes investigations of federal criminal violations, including
 19 organized crime, internet-based crimes, money laundering, and transportation of stolen
 20 property. I have attended the FBI Special Agent Training Course, and I have participated
 21 in several internet crime investigations. Prior to joining the FBI, I was employed by the
 22 U.S. Department of State, where I specialized in Eastern European affairs.

23 3. The facts in this affidavit come from my personal observations, my training
 24 and experience, information obtained from other federal agents, from local police officers
 25 and retail Loss Prevention Officers, interviews of cooperating witnesses, reviews of
 26 documents and records related to this investigation, and communications with others who
 27 have personal knowledge of the events and circumstances described herein. Because this
 28 Affidavit is submitted for the limited purpose of establishing probable cause in support of

1 the application for a search warrant, it does not set forth each and every fact that I or
2 others have learned during this investigation. I have set forth only the facts I believe are
3 necessary to establish probable cause to believe that evidence, fruits and instrumentalities
4 of violations of the crimes set forth in Paragraph 9 will be found at the locations set forth
5 in Paragraphs 10-14.

6 **B. Case Summary**

7 4. This investigation has revealed that two pawnshops, INNOVATION BEST
8 (located in Kent, Washington) and THRIFT-ELECTRO (in Renton, also known as BUY-
9 TRADE and BY-TRADE), and their employees, have been paying cash for stolen
10 property, buying from shoplifters who primarily steal from brick and mortar retail stores
11 (Home Depot, Lowes, Fred Meyer, etc.), from delivery drivers who stole from
12 Amazon.com, and from drug addicts and drug users. Members of the conspiracy transport
13 the stolen products from these two pawnshops to a warehouse in Kent, Washington, from
14 which the products are transported by the United States Postal Service (USPS), United
15 Parcel Service (UPS), and other mail carriers, at times estimated to be in bulk shipments
16 valued at more than \$5,000. The products are stored in Kent or in Amazon.com
17 (hereafter, "Amazon") fulfillment centers located outside the state of Washington, and
18 are sold in interstate commerce via Amazon's website using seller names such as
19 "Bestforyouall" or Freeshipforyou." Amazon has disbursed funds back to bank accounts
20 under the control of members of this conspiracy, which bank accounts are used to
21 promote the carrying on of the criminal activity under investigation. These funds also
22 appear to be used to conceal the nature of the unlawful activity, by making the pawn
23 shops appear like a legitimate business, when in fact the pawn shops are front enterprises
24 for the conspiracy, and are permeated with fraud and conduct virtually no legitimate
25 business beyond buying and re-selling stolen property. The value of property involved in
26 this case has reached well into the millions of dollars since this criminal activity began,
27 which is estimated to be during the years 2013-2014.

5. ALEKSANDER PAVLOVSKIY (DOB: 03-24-1975) is considered the leader of this conspiracy. Washington State Department of Revenue (DOR) records show PAVLOVSKIY as the “governing” person for THRIFT ELECTRO, INNOVATION BEST, and EURODEALS, LLC. He is listed on Amazon records as the account holder/operator on two businesses which sell products on Amazon, “Farless Wholesale,” and “RT Trading, LLC.” He is also listed as the account holder on all bank accounts to which Amazon sends payment for the items sold in this conspiracy. Based on surveillance and pole cameras in this case, investigators and I have also determined that PAVLOVSKIY routinely arrives at the INNOVATION BEST retail store in Kent early on Friday mornings, where he personally loads property and transports it to the Kent warehouse. PAVLOVSKIY is Ukrainian by birth and entered the United States as a refugee in November 2000 with his wife Nadezhda PAVLOVSKAYA and their children. He was naturalized in the United States in September 2011 and is a US citizen.

C. Washington State Laws, Pawn Shop Operations, and Terms

6. Pawn shops in Washington State are governed by the Revised Code of Washington (RCW), Chapter 19.60, titled “Pawnbrokers and Secondhand Dealers.” RCW 19.60.020 imposes a “duty to record information” on pawnshops operating in Washington. This law states, “Every pawnbroker and secondhand dealer doing business in this state shall maintain wherever that business is conducted a record. . .” of the following information:

- The signature of the person with whom the transaction is made;
- The date of the transaction;
- The name of the person or employee or the identification number of the person or employee conducting the transaction;
- The name, date of birth, sex, height, weight, race, and address and telephone number of the person with whom the transaction is made;

- 1 • A complete description of the property pledged, bought, or consigned, including
2 the brand name, serial number, model number or name of the item;
- 3 • The price paid or the amount loaned;
- 4 • The type and identifying number of identification used by the person with whom
5 the transaction was made, which shall consist of a valid driver's license or
6 identification card issued by any state or two pieces of identification issued by a
7 governmental agency, one of which shall be descriptive of the person identified.
8 At all times, one piece of current government issued picture identification will be
9 required; and
- 10 • The nature of the transaction, a number identifying the transaction, and name and
11 address of the store purchasing the item.

12 7. Terms Used in this Affidavit

13 (a) **"LeadsOnline"** is a database used by pawnshops in Kent, Auburn, Renton,
14 and other Washington cities, to record the above data. LeadsOnline is an
15 internet-based system, requiring the use of computers to input the data. Auburn
16 Police detectives used LeadsOnline during this investigation. Although not
17 required by Washington State law, investigators learned that pawnshop clerks
18 involved in this conspiracy took photographs of many items pawned, which
19 photos were uploaded into LeadsOnline. Accordingly, references within this
20 affidavit to photographs examined by police refers to photos in LeadsOnline.

21 (b) **Anti-theft stickers** are placed on products by retailers to deter theft and
22 prevent the resale of retail property.

23 (c) **"Spider Wire" or spider wrap** is a theft deterrent placed on high value, high
24 theft items in retail stores. It is typically a black wire around all four sides of a
25 box, attached in the middle to an electronic device. Spider wrap is removed by
26 store employees at a cash register when a legitimate purchase is made, or else a
27 sensor will set off an alarm when the wrapped item is exiting a store. Items still
28

1 wrapped in spider wrapped outside a retail store are indicative that the items
2 are most likely stolen.

3
4 **8. Background about pawnshops.** Auburn Police detectives involved in this
5 case have spoken to dozens of pawn shop managers and employees, and have visited
6 dozens of pawn shops, during their careers. They have learned that pawn shops which
7 operate legally usually purchase *used* items and re-sell them on store shelves in retail
8 shops that are open to the public. Many pawnshops conduct "No Buy" checks to see if the
9 seller is on a police "no buy" list, indicating the seller has been recently convicted of drug
10 and/or theft crimes. If a pawn shop believes a fake ID or stolen property is being
11 presented, they will deny the transaction. Used items have values which have depreciated
12 over time, making a twenty cents on the dollar exchange reasonable. Pawnshops
13 operating legally do not purchase items which have anti-theft stickers or spider wrap still
14 on the packaging, because these are indicia of stolen property. People who legally pawn
15 or sell items to a pawn shop usually sell items which are used and not new in the box.

16 **II. CRIMES UNDER INVESTIGATION AND LOCATIONS TO BE**
17 **SEARCHED**

18 **A. Crimes Under Investigation**

19 9. For each property, I am requesting a warrant to seize documents, records,
20 computers and electronic devices, currency, retail products that are new and in original
21 packaging, and other items, specified in Attachment B, that constitute evidence, fruits,
22 and/or instrumentalities of the following crimes:

23 18 U.S.C. § 2314 (Transportation of stolen goods in interstate commerce);

24 18 U.S.C. § 2315 (Sale of stolen goods in interstate commerce);

25 18 U.S.C. § 371 (Conspiracy); and

26 18 U.S.C. §1956 (Money laundering).
27
28

B. Locations to be Searched

**Location 1: INNOVATION BEST (Business Premises)
25628 and 25630 102nd Pl SE, Kent, Washington**

10. Location 1 (INNOVATION BEST) is located at 25628 and 25630 102nd Pl SE, Kent, Washington, and consists of two adjoined units within a multi-business, strip-mall complex, further described in Attachment A-1. INNOVATION BEST first registered an account with LeadsOnline on January 18, 2017, using an address of 25616 – 102nd Place SE, Kent, which is in the same retail complex as Location 1.

**Location 2: INNOVATION BEST (Storage and Office Premises):
22710 72nd Avenue South, Suite 109, Kent, Washington 98032**

11. Location 2 is a storage facility and adjacent office premises, further described in Attachment A-2. According to Washington State Department of Revenue (WA-DOR) online records, the WA-DOR issued a business license for “INNOVATIONBEST” (all one word) on December 13, 2016. The only governing person listed for this business is “Alex Y PAVLOVSKIY,” and the WA-DOR website lists Location 2 as both the “Location Address” and “Mailing Address” for “INNOVATIONBEST, LLC.”

**Location 3: BUY-TRADE/THRIFT-ELECTRO (Business Premises):
20 Southwest 7th Street, Unit J, Renton, Washington 98057**

12. Location 3 is one unit within a single-story, retail strip mall, further described in Attachment A-3. According to Washington State Department of Revenue (WA-DOR) public records for Thrift-Electro, the WA-DOR first issued a business license for THRIFT-ELECTRO, INC. on December 15, 2017. The only governing person listed for this business is “Alexandr PAVLOVSKIY.” The WA-DOR website lists two separate addresses for THRIFT-ELECTRO, INC: a “Location Address” of 1171 Kirkland Avenue NE, Renton, WA 98056, and a “Mailing Address” of 22710 72nd Avenue South, Suite 109 Kent, WA 98032 (this mailing address is the storage/office premises of

1 INNOVATION BEST, Location 1, above). Buy Trade first registered an account with
 2 LeadsOnline on July 16, 2013, under the name "Buy Trade, LLC," listing a "contact" of
 3 Aleksandr Pavlovskiy. Thrift Electro's business license states: "By Trade," 20 SW 7th St,
 4 Suite J, Renton, Washington."

5 **Location 4: The residence of ALEKSANDR PAVLOVSKIY: 30323 – 110th Place**
 6 **S.E., Auburn, Washington 98092**

7 13. Location 4 is a two-story, single family residence, further described in
 8 Attachment A-4. King County Assessor records show Location 4 was purchased by
 9 "ALEKSANDR" PAVLOVSKIY and NADEZHDA PAVLOVSKAYA on June 1, 2018
 10 for \$450,000. These records indicate Location 4 is a four-bedroom, single-family home
 11 built in 1999.

12 14. **Vehicle 1:** Vehicle 1 is a Grey, Mercedes Benz, "Sprinter" model transport
 13 van, Washington State license plate number C20127G, VIN # WD4PE8DD8GP234633.
 14 According to Washington State DOL records, the van is registered to THRIFT
 15 ELECTRO at the address of Location 3.

16 **III. SUMMARY OF INVESTIGATION**

17 **A. The Auburn Investigation Begins: Summer 2018.**

18 15. **JW Logistics Employee Muthana Haidar.** In July 2018, Auburn Police
 19 Detective Eric Mattson was reviewing LeadsOnline data when he noticed that Muthana
 20 Haidar had made 57 pawn shop transactions between February and July 2018. Of the 57
 21 transactions, 48 took place at INNOVATION BEST. The property Haidar sold included
 22 new, in the box electronics, household goods, gaming systems, computer products, tools,
 23 kitchenware, sporting goods, and sewing machines, which Auburn police valued at
 24 several hundred thousand dollars. Per LeadsOnline, Haidar received a total of \$27,714 for
 25 the items he sold to INNOVATION BEST, as well as \$2,305 from two other pawnshops,
 26 Cash America and Gold-Silver Traders, for a grand total of \$30,019.

27 16. Detective Mattson contacted Amazon Loss Prevention Officers (LPO's),
 28 who confirmed that Haidar was employed by JW Logistics (JWLO) as a truck driver, and

1 was contracted with Amazon out of their Kent, Washington warehouse (called BFI5).
2 Amazon LPO's began an internal investigation into Haidar and determined that Haidar
3 had been stealing property from Amazon customer returns, which he picked up from Sea-
4 Tac airport and when he was delivering orders to the US Post Office. On August 3, 2018,
5 Amazon LPO's interviewed Haidar at the Kent/BFI5 warehouse. When confronted,
6 Haidar initially said he did not know about the thefts. After being confronted again,
7 Haidar replied, "I can pay back." When asked what he meant by "pay back," Haidar
8 would not elaborate. By reviewing Amazon delivery records, customer reports of lost
9 property or property never delivered, and LeadsOnline data, detectives and Amazon
10 LPO's determined that all the property Haidar had sold to INNOVATION BEST had
11 been stolen from Amazon deliveries. Haidar was arrested and booked into jail for this
12 offense, but was released at the request of Auburn Police so as not to disrupt the larger
13 investigation. He was not offered any promises or benefits to gain his release, and
14 officers have not contacted him since his release, pending completion of this
15 investigation.

16 17. **JW Logistics Employee Abbas Zghair.** In August 2018, Amazon LPO's
17 contacted Auburn police about a second employee of JWLO, Abbas Zghair, who Amazon
18 estimated had stolen around \$100,000 in property. The LPO's reported that Zghair and
19 Haidar had possibly been living together, and they theorized that the two may have been
20 working together as a team when committing the thefts. Amazon LPO's reported Zghair
21 committed these thefts using the same method as Haidar, by focusing on Amazon returns
22 picked up from Sea-Tac airport and deliveries to the US Post Office. According to
23 LeadsOnline, police found Zghair had conducted 60 transactions at INNOVATION
24 BEST between February 7, 2018 and July 7, 2018, and had sold around \$100,000 worth
25 of property, including personal electronics, household goods, gaming systems, computer
26 products, sporting goods, etc., all of which was new and in its original packaging. Zghair
27 received \$19,306 from INNOVATION BEST for the stolen Amazon property.

1 18. **Peter Shalhoob.** Separate from the Haidar/Zghair investigation, in August
2 2018, a Fred Meyer Organized Retail Crime (ORC) Investigator, Maria McGuiness,
3 contacted Auburn Police Detective Dave Lind, and advised him Fred Meyer LPO's in
4 Kent, Washington had identified Peter Shalhoob as stealing a large number of items from
5 that store, and it appeared to be related to ORC. McGuiness stated Shalhoob was stealing
6 large volumes of Oral B tooth brushes, Fire Alarms, Zyrtec allergy medication, and other
7 items. On August 8, 2018, Auburn detectives interviewed Shalhoob, who admitted he
8 was using heroin and stole in order to fund his drug habit. Shalhoob explained that he
9 shoplifted items from local businesses such as Fred Meyer, Lowes, Home Depot, and
10 Walmart, and sold the items to INNOVATION BEST (Location 1).

11 19. When detectives asked if he had ever been directed to steal a certain
12 product, Shalhoob responded that on one occasion, he stole Zyrtec (allergy pills) 30 count
13 bottles and attempted to sell them INNOVATION BEST. The clerk told him they did not
14 want 30 count bottles, but would purchase 70 count bottles if he brought them in.
15 Shalhoob then stole several bottles of 70 count Zyrtec, which the clerk then purchased.
16 Detectives checked LeadsOnline, which data corroborated Shalhoob's statement,
17 showing that on July 26, 2018, INNOVATION BEST purchased 70 count bottles of
18 Zyrtec from Shalhoob, along with Crest Strips, Claritin, Oral B toothbrushes, and Carbon
19 Monoxide Alarms. During that transaction, Shalhoob received \$180.00 from
20 INNOVATION BEST.

21 20. Detectives reviewed all transactions made by Shalhoob over a thirty-day
22 period (July 14 to August 13, 2018), and found that Shalhoob had been to
23 INNOVATION BEST sixteen (16) times during that 30 day period, receiving a total of
24 \$1,835.00 in cash for selling products. On average, he was paid thirty-two cents for every
25 dollar of full retail value for the items he sold, based on detective research and estimates.
26 On August 13 alone, LeadsOnline indicated that Shalhoob sold a Sonicare toothbrush,
27 four boxes of "Alli" brand weight loss capsules, a Braun Thermoscan, and a box of Crest
28 Whitestrips. Doing online research of third party retailers such as Ebay, and primary

1 retailers such as Target and Walmart, detectives determined that the total (average) retail
2 price for all the items Shalhoob sold to INNOVATION BEST on August 13 was \$538.43.
3 According to LeadsOnline, Shalhoob received \$75.00 for these items.

4 21. **One day sales at INNOVATION BEST and THRIFT ELECTRO.** In
5 order to obtain a better idea of daily transactions for the two pawnshops under
6 investigation, Auburn detectives examined LeadsOnline data for all transactions at these
7 two locations occurring on one day chosen at random, August 13, 2018. Detectives
8 determined that on August 13, INNOVATION BEST logged 31 total transactions and
9 paid \$3,958.00 to sellers. Detectives determined that all but two of the items were new,
10 unused, and still in original packaging. Using an average online price, detectives
11 determined these products retailed new for an average (total) of \$15,611.36.
12 LeadsOnline data also showed that THRIFT-ELECTRO had logged 11 transactions and
13 paid \$891.00 to the sellers on August 13. All of the items sold appeared to be (based on
14 LeadsOnline photos) new, unused, and still in original packaging. Using an average
15 online sales price, detectives found that these products retailed new for an average (total)
16 cost of \$2,708.07.

17 **B. Controlled Sales to INNOVATION BEST: August-September**
18 **2018.**

19 22. **Controlled Sale #1: August 24, 2018: Failing to Log Serial Numbers.**
20 In August and September 2018, Auburn detectives and Fred Meyer and Home Depot
21 LPO's conducted a series of controlled sales to INNOVATION BEST to assess whether
22 employees would overlook pawn shop laws and regulations. The first controlled sale
23 occurred on August 24, 2018, using a NEST brand thermostat provided by Home Depot
24 LPO's, with an average retail value of between \$220 and \$250. The NEST was marked
25 with a manufacturer's serial number, visible from outside the box, and was still wrapped
26 in the store packaging, obviously never having been opened. On August 24, Home Depot
27 LPO Henry Roland entered INNOVATION BEST and was greeted at the front
28 window/counter by a female clerk who was later listed in LeadsOnline as "Tanya." When

1 Roland offered to sell the NEST, the woman offered him \$60. He attempted to get \$80,
2 but the woman refused. After Roland agreed to \$60, the woman asked to see his
3 identification. After viewing his ID, the woman told Roland the photo did not look like
4 him, and she said she did not think it was him. Roland reported that the female completed
5 the transaction anyway, giving him \$60 cash. Detectives later checked LeadsOnline and
6 found the transaction listed as #8378, occurring at 12:44 p.m. Detectives noted that the
7 NEST serial number was not listed in LeadsOnline as required by RCW 19.60.020, and
8 which logging would aid law enforcement in tracking the item.

9 **23. Controlled Sale #2: August 28, 2018: Ignoring Anti-Theft, No-Resell**
10 **Stickers.** On August 28, 2018, detectives conducted another controlled sale to
11 INNOVATION BEST. Fred Meyer LPO's provided three, brand new, in the box, Oral B
12 electronic toothbrushes, with an average total retail value of \$208.97. One of the
13 toothbrushes had an anti-ORC sticker on it that read, "Thank You For Buying @ Fred
14 Meyer, If found for resale elsewhere call 1-800-689-4609." LPO Roland conducted the
15 controlled sale, entering INNOVATION BEST and selling the three toothbrushes for \$40
16 cash. After the sale, Roland informed Auburn police that he dealt with the same female
17 clerk as on August 24. Roland reported that the clerk did not seem to care about the anti-
18 theft sticker placed conspicuously on the toothbrush. The \$40 was given to Fred Meyer
19 LPO's to offset the cost of the investigation. Detectives checked LeadsOnline and found
20 the transaction had been logged under transaction# 8473. Detectives also checked an
21 online sales website ("Offerup"), and found several Oral B Power models for sale at \$75
22 each. This controlled sale corroborated the illicit nature of INNOVATION BEST, whose
23 employees should know that it is not reasonable for a person to sell three toothbrushes for
24 a total of \$40 (vs. the total value of \$208.97), when they could sell the same items on a
25 website like Offerup for \$75 each.

26 **24. Controlled Sale # 3: August 30, 2018: Directing Sellers to Purchase**
27 **Specific Products, and Failing to Check ID.** On August 30, Fred Meyer LPO Roland
28 entered INNOVATION BEST with three packages of "30 count" Zyrtec allergy

1 medication. As he approached the door, Roland observed a male and female enter the
2 store ahead of him and approach the counter before him. Detectives later identified the
3 female as Tabernay Simon, and found the transaction logged on LeadsOnline. Simon
4 presented a foil-lined bag full of Allergy medication, thermometers, and other new, in the
5 box retail items. It is common for shoplifters to hide merchandise in foil-lined bags, as it
6 is believed that this helps bypass security sensors at the doors. As the female clerk told
7 Simon how much they would pay her, the male stepped up to the window, removed
8 additional items from inside his coat, and asked if he could sell the items. Roland
9 observed that the male's items were similar to what the female presented. The male
10 agreed to sell the items and the clerk came to the window with two bundles of money,
11 one for the female and one for the male. Roland noted that the male never produced an ID
12 for the clerk to check, nor signed any paperwork, as required by RCW 19.60.020. The
13 female signed all paperwork.

14 25. After the couple left, Roland presented the "30 count" Zyrtec packets to the
15 clerk, who told him that she would not buy them, but wanted "70 count" packets instead,
16 just as in Shalhoob's case. Roland left the store, waited approximately fifteen minutes,
17 and returned with three, "70 count" Zyrtec packets, valued at \$34.99 each. Detectives
18 surmised that the fifteen minute time period would be long enough for a shoplifter to visit
19 a nearby retail store, but too short for anyone to legitimately acquire pills and quickly re-
20 sell them. The clerk gave Roland a total of \$13 cash for the \$104.97 worth of Zyrtec. This
21 transaction corroborated the illicit nature of INNOVATION BEST, whose employees
22 should have known that no reasonable person would return in under twenty minutes, after
23 being denied a sale, with several bottles of brand new, "70 count" pills valued at more
24 than \$100, and sell them for \$13.

25 26. **Controlled Sale # 4: September 4, 2018: Ignoring Anti-Theft, No**
26 **Resell Stickers.** The fourth controlled sale occurred on September 4, 2019. During this
27 transaction, detectives placed anti-theft/anti-re-sell stickers on three brand new, in the
28 box, Oral B Toothbrushes to see if INNOVATION BEST clerks would deny the sale.

1 The stickers read "Thank you for buying @ Fred Meyer, if found for resale elsewhere call
2 1-800-689-4609." Retailers place these stickers on commonly stolen items in order to
3 thwart theft and resale. The stickers are bright white, black, and red and are
4 approximately the size of two quarters. When looking at the product, they are very
5 visible. The transaction took less than five minutes. Roland stated the clerk, identified in
6 LeadsOnline as "Tanya," said nothing about the stickers and purchased all three items for
7 \$34. Detectives and LPO's determined that the total retail value of the items was
8 \$215.97, had they been sold at Fred Meyer.

9 27. **Controlled Sale #5: September 5, 2018: Ignoring "spider wrap."** On
10 September 5, 2018, detectives and LPO's conducted another controlled sale of new tools:
11 a new, in the box, 4-tool combo back of Milwaukee tools valued at \$429.99; a new, in the
12 box Milwaukee PVC pipe shearing tool, valued at \$139.99; and a new, in the box
13 Milwaukee cordless hand saw valued at \$149.99. Detectives determined that the total
14 retail value for these items was \$719.97 if sold in Home Depot. The cordless hand saw
15 was still wrapped in an anti-theft "spider wrap." Roland and an Auburn police detective,
16 dressed in plain clothing, entered INNOVATION BEST with the three items, including
17 the spider wrapped item. The female clerk accepted all three items, giving Roland \$155
18 cash. Roland and the detective watched the clerk take the still-spider-wrapped item to the
19 back store room of INNOVATION BEST. The clerk made no mention of the security
20 device on the tool, and completed the transaction without discussing it. Detectives
21 reviewed the transaction log and found it listed under transaction #8646. This transaction
22 corroborated the illicit nature of INNOVATION BEST, as its employees were willing to
23 buy new, in the box products still wrapped in anti-theft spider wrapping.

24 **C. LeadsOnline Transaction Data and High Volume Sellers**

25 28. Auburn Detectives obtained LeadsOnline data for three business entities:
26 INNOVATION BEST, THRIFT ELECTRO, and BY-TRADE (in LeadsOnline it was
27 listed as "BUY-TRADE") for October 2013 to May 23, 2019. According to LeadsOnline,
28

1 during this time period, the three businesses paid \$4,125,490.13 to sellers who sold
2 47,536 separate items. Some of the highest volume sellers were: (a) Andrea Phillips, who
3 received \$57,988 in 1182 separate transactions at INNOVATION BEST. She also
4 received \$35,958 from THRIFT-ELECTRO in 176 separate transactions; (b) Todd
5 Sherman, who received a total of \$37,081 in 240 separate transactions at INNOVATION
6 BEST; (c) Maranda Hovey, who received \$61,196 from THRIFT-ELECTRO in 525
7 separate transactions. Approximately fifty different sellers have received over \$10,000 at
8 these pawnshops during this timeframe, and several hundred sellers have received well
9 over \$1,000 each.

10 29. **Myo Aung.** In September 2018, Auburn Detective Mattson was reviewing
11 LeadsOnline data regarding the pawn history of Myo Aung. He noticed that between June
12 12, 2018 and September 20, 2018, a period of 100 days, Aung sold property to
13 INNOVATION BEST on 88 of those days. The property sold by Aung was all brand new
14 and in its original packaging, and consisted of items such as allergy medication, razors,
15 electric toothbrushes, smoke detectors, hair treatment shampoo, LED lights, pain
16 medication, ink cartridges, small electronics, small kitchenware items, teeth whitening
17 strips, water filters and other items an individual could find in retail stores. According to
18 LeadsOnline, the property sold by Aung had a retail value of approximately \$40,000, yet
19 Aung received \$9,665 in payments from INNOVATION BEST. LeadsOnline also
20 recorded that Aung had sold property at a pawn shop called "Make a Deal," in Kent,
21 Washington. LeadsOnline data showed that the clerk who handled the transaction at
22 "Make a Deal" was Alexander Sorochnikov, who detectives knew used to work at
23 INNOVATION BEST (based on LeadsOnline data and business records). Sorochnikov had
24 been the INNOVATION BEST clerk who handled many of the transactions with Haidar
25 and Zghair. The property sold by Aung to "Make a Deal" was similar to the products
26 Aung had sold to Innovation Best.

27 30. On June 12, 2019, Myo Aung was arrested at a Renton Fred Meyer for theft
28 of more than \$800 worth of supplements, allergy medication, and other items. These are

1 the same types of products he had been selling to INNOVATION BEST for the past year.
2 During his interview with Fred Meyer LPO's, Aung admitted using heroin and
3 methamphetamine, and acknowledged he had been arrested several weeks before at the
4 Kent Fred Meyer. Aung told the LPO's that he had been selling stolen property at a pawn
5 shop "near the Renton Fred Meyer," and to a "Russian" who he only knew as "Alex."
6 The Fred Meyer in Kent is located approximately two miles from Location 1.

7 31. **May Khello.** On February 25, 2019, Detective Mattson responded to a
8 Safeway store in Auburn, Washington, in response to an alleged robbery. A female
9 suspect who had identified herself as Narwaz F. Khello was in custody and had agreed to
10 speak with detectives. Mattson was familiar with Narwaz Khello and had been tracking
11 multiple sales she had made of retail items such as Masterlocks, Oral B toothbrushes,
12 creams, and other items, to INNOVATION BEST. Mattson determined that the female
13 was actually May F. Khello, who agreed to provide a Mirandized statement. Khello
14 reported that she and two female friends had been committing thefts at several stores in
15 King County for the past several months. Though Khello was not willing to provide the
16 names of her friends, Mattson later contacted her mother, Almaza Kadur, who provided
17 the first names of the friends as "Mercedes" and "Cashmere." Using LeadsOnline,
18 Mattson was able to identify the two as Mercedes Renfro and Cashmere Shabazz. Khello
19 stated she had been using her older sisters' driver's license to sell the stolen property
20 because she was under eighteen.

21 32. Khello told police that her group targeted Fred Meyer stores and focused on
22 stealing vitamin supplements, allergy medications, locks, electric toothbrush heads, hair
23 products, skin cream, and makeup. Khello said they would take the stolen property to a
24 shop in Kent run by "Russians," who would "buy everything they had." Khello could not
25 provide the name of the shop, but said it had a sign in front that said, "Gold and Silver."
26 She described the location as being next to a "nail salon and a bar." Her description was
27 consistent with Location 1; INNOVATION BEST is located in between a nail salon and
28 "Carriage Bar & Grill," and has a "Gold & Silver" sign affixed to the building above its

entry door. When Mattson asked Khello if the individual who purchased the stolen property ever asked how it came into her possession, she replied, "No, they never ask anything." When asked if she ever told employees of INNOVATION BEST that the property she was selling was stolen, she replied, "No, you would never tell them that, but they know it's all stolen, how could you not know? You should see all the stuff people bring in that place and it's all stolen."

33. According to LeadsOnline, the transaction history of Khello, Renfro, and Shabazz showed the following sales by each woman at INNOVATION BEST:

Seller	Transactions	Amount Received
May Khello	27	\$2,243
Mercedes Renfro	125	\$13,966
Cashmere Shabazz	37	\$2,475

Mattson noted that most transactions occurred on the same date and time for all three women. LeadsOnline data also corroborated Khello's statement, showing that property sold by the trio consisted of the same products Khello had described during her interview.

34. **R.D.** On June 5, 2019, I interviewed a cooperating witness identified as RD, together with Auburn Detectives and an Assistant United States Attorney. RD agreed to provide a statement without Miranda rights and with no promises, although he was informed that he was not a target of this investigation. RD informed us that he had worked for Boeing for 23 years, after which he had fallen on hard times, eventually becoming addicted to heroin. In order to feed his heroin habit, RD turned to pawning items. RD informed us that he had heard about pawnshops operated by "The Russians," who would buy things, "no questions asked." In 2018, RD visited the parking lot of

Location 1 and found a man who RD described as a white male with short blonde hair and blue eyes. The man asked RD if RD possessed a valid Washington state identification. When RD said he did, the man asked him to sell some items inside

Location 1. RD sold between three and five K&D brand automotive air filters, which RD

1 estimated as retail value of \$40-\$60 each, inside Location 1. RD said the female clerk,
2 “Asked me if it was mine,” referring to the air filters, but otherwise never asked any other
3 questions. RD said he received between \$10 and \$15 each for the filters. He gave the
4 profits to the blonde male, who in turn gave RD \$20 for assisting him. RD said he used
5 the profits to feed his heroin habit.

6 35. RD said he returned to Location 1 numerous times over the next eight
7 months, always selling K&D brand automotive air filters, always receiving between \$10
8 and \$15 for each filter. RD assumed the property was stolen because it was new, in the
9 box, and he was receiving and selling the exact same product repeatedly over the course
10 of eight months. He said he saw many other people selling items at Location 1 including
11 “sacks of vitamins” and other new, in the box items. RD said the only *used* property that
12 Location 1 would buy were tools, and he reported that INNOVATION BEST would only
13 buy items valued at more than \$15. Upon being shown Washington DOL photos, RD
14 identified Svetlana PAVLOVSKAYA and Daria Dolgova as two of the clerks at Location
15 1 who bought his property. According to multiple databases, Svetlana Pavlovskaya is the
16 daughter of Aleksander PAVLOSKY and Nadezhda PAVOLVSKAYA. Using
17 LeadsOnline, Auburn Detectives determined that RD had sold items at Location 1 a total
18 of 126 separate times, receiving a total of \$7,500, over the course of approximately eight
19 months. RD said he stopped selling items at Location 1 in early May 2019, when Auburn
20 detectives contacted him about this case.

21 **D. Police Surveillance.**

22 36. On July 5, 2018, Auburn police conducted surveillance at INNOVATION
23 BEST (Location 1) and observed Vehicle 1 parked in front of the store. Through a
24 Washington DOL check, they learned that Vehicle 1 was registered to Thrift-Electro,
25 Renton, Washington. After Vehicle 1 parked, a female, identified by DOL photos as
26 PAVLOVSKIY’S wife, Nadezhda Pavlovskaya, exited and opened the back doors of the
27 van. The detective could see several brown crates in the back of the van. A short time
28 later, a female exited Location 1 and assisted Pavlovskaya in removing the crates from

1 the van and carrying them into Location 1. The detective recognized these crates as being
2 similar to crates detectives had observed in photographs on LeadsOnline, which clerks
3 had logged in after purchasing stolen property from Muthana Haidar.

4 **37. On August 14, 2018,** Auburn police detectives conducted surveillance of
5 Location 1 in an attempt to see what sort of business they conducted on a typical day. At
6 approximately 12:15 p.m., they observed an Oldsmobile pull into the parking lot and park
7 in front of Location 1. A female got out of the car and removed a large box from the back
8 seat. Detectives could see the box was a brand new set of halogen painter's lamps, still in
9 their original box. A DOL check of the vehicle indicated it was registered to Shatoya
10 Talbert. Police records showed that Talbert had been contacted at Fred Meyer in Auburn
11 in September 2017, and was arrested on a Federal Way Theft warrant.

12 **38. On August 15, 2018,** detectives surveilled Location 1 and observed an
13 SUV pull in and park. Two females exited, removed several new, in the box items from
14 the SUV, and carried them into Location 1. One item was a large aquarium filter, which
15 detectives knew to be worth well over \$100 new in stores. After a few minutes, both
16 females exited the store without any of the items, and departed. A detective later
17 reviewed LeadsOnline and found that INNOVATION BEST had logged the sale and
18 recorded giving the seller, Sara Lockman \$670 for Aquarium filters, musical recording
19 equipment, bike equipment, LED lights, and other items. A further review of Lockman's
20 pawn history revealed that she had sold to Innovation Best seventeen times since January
21 2018, receiving an average of \$250 from the store clerks. Many transactions involved
22 high priced aquarium filters and equipment, all of it new.

23 **39. On August 30, 2018.** Auburn police conducted surveillance at Location 1
24 on 30 August 2018 when they observed a Ford Taurus pull into the parking lot. Three
25 men exited the Taurus, opened the trunk, and removed property, including a Shark
26 Vacuum cleaner, a Honeywell air cleaner, three Coleman inflatable bed mattresses, and
27 several small boxes of other items. All of the property appeared to be brand new and in
28 its original packaging. Using LeadsOnline, police later confirmed that someone named

1 Rickey Millen-Sparks had sold these items at INNOVATION BEST, all of it new and in
2 original packaging. A copy of this sale and photographs was uploaded to the case.
3 Innovation Best paid \$290.00 for those items, but an online search revealed the items
4 would retail for an average total of approximately \$970.00.

5 40. Four days later, on September 4, 2018, Auburn Police Detective Aaron
6 Ernst was conducting surveillance at Location 2 (the warehouse in Kent), when he
7 observed Vehicle 1 (the Mercedes Sprinter van), back its way up the right-side ramp of
8 Location 2 and park inside the warehouse, after which, someone closed the roll-up door
9 behind the van. Approximately one hour later, someone opened the left-side roll up door
10 at Location 2. Detective Ernst could see that a large amount of property had been placed
11 on the warehouse floor in front of this left-side door. Some of the property had been
12 partially covered with what appeared to be a large blanket. The officer observed three
13 Coleman inflatable air mattresses in their distinctive green boxes stacked up next to the
14 property under the blanket. These boxes were consistent in appearance with the three
15 boxes officers had observed being brought in and sold to INNOVATION BEST on
16 August 30, 2018.

17 41. On September 4, 2018, Auburn detectives surveilled the previous location
18 of Thrift Electro (at 1171 Kirkland Ave NE, Renton), when they observed Vehicle 1
19 parked behind the store with the back doors open. They observed Alexander
20 PAVLOVSKIY remove several items from Vehicle 1 and carry the items into the store.
21 They then observed PAVLOVSKIY drive Vehicle 1 from Thrift Electro directly to
22 Location 2, where he backed the van onto the right-side ramp; the roll-up door opened
23 and he backed inside. After about an hour, the roll up door closed, with the van still
24 inside. From his vantage, Detective Mattson could clearly see into the open warehouse
25 door; he observed large pallets of retail merchandise inside Location 2, similar to the
26 items bought at INNOVATION BEST and THRIFT ELECTRO. Detectives were at
27 Location 2 for several hours and did not observe the van (Vehicle 1) leave.
28

1 42. **On (Friday) September 21, 2018**, Auburn Detective Ernst was conducting
 2 surveillance at Location 1 when he observed Vehicle 1 (the Sprinter Van) arrive and back
 3 up to the front door. Detective Ernst observed Aleksander PAVLOVSKIY load boxes
 4 from the store into the back of the van for approximately one hour. After Vehicle 1 was
 5 loaded from floor to ceiling, PAVLOVSKIY left. Detective Ernst maintained surveillance
 6 on the van and watched PAVLOVSKIY drive it directly from INNOVATION BEST to
 7 Location 2. Detective Ernst watched the van back up to the right-side roll up door at
 8 Location 2. When the door opened, PAVLOVSKIY backed Vehicle 1 inside Location 2,
 9 just as it had done on September 4, 2018. After Vehicle 1 entered, someone closed the
 10 warehouse roll-up door, which remained closed until Detective Ernst left approximately
 11 one hour later.

12 43. **On (Friday) May 24, 2019**, at approximately 04:40 a.m., Auburn
 13 Detectives Ernst and Lind conducted surveillance at Location 1 when they observed
 14 PAVLOVSKIY arrive at Location 1 in a white Mercedes sedan and park outside the entry
 15 door. PAVLOVSKIY exited the vehicle and entered Location 1. At approximately 05:50
 16 a.m., PAVLOVSKIY exited the store and left in the Mercedes. Based upon this activity,
 17 six hours before the store was scheduled to open (at 11:00 a.m.), detectives surmised that
 18 PAVLOVSKIY was preparing products for shipment, as detectives had observed on other
 19 Fridays. Approximately one hour later, shortly before 07:00 a.m., a Hyundai sedan and
 20 the Sprinter van (Vehicle 1) arrived and parked in front of Location 1. Detectives could
 21 see that PAVLOVSKIY was driving Vehicle 1, and a woman, identified via a
 22 Washington State DOL photo as Agniya N. Bobrova, was driving the Hyundai. From
 23 approximately 06:56 a.m. until 07:35 a.m., detectives observed Pavlovsky and Bobrova
 24 moving boxes and items from inside Location 1 to the back of the van. Bobrova left in
 25 her vehicle at around 07:34 a.m. A few minutes later, PAVLOVSKIY left the store,
 26 locked the door of Location 1, and left in Vehicle 1.

27 44. **On (Friday) June 7, 2019**, at shortly before 07:00 a.m., I surveilled
 28 Location 2 (the warehouse) when I observed Alexander PAVLOVSKIY open the right,

1 roll-up door, and exit Location 2 driving Vehicle 1 (the Sprinter van). He was gone for
2 approximately one hour. During the hour he was gone, I observed six cars arrive and park
3 in the parking lot in front of Location 2. I saw seven women and one man exit these cars
4 and enter the front glass door of Location 2. I also saw an OfficeMax delivery truck
5 arrive and deliver a package inside Location 2, and I saw one employee carry one US
6 Postal Service box and one DHL box into Location 2. These observations appeared to
7 corroborate our investigative conclusions that Location 2 was serving as a business/office
8 space for this conspiracy.

9 **E. Auburn Police interactions with employees of Innovation Best.**

10 45. **Interaction May 16, 2019 at Location 1.** On May 16, 2019, Auburn
11 Detectives Mattson and Ernst visited Location 1 to recover several items of suspected
12 stolen property related to a past case. They noticed several people waiting outside the
13 store before it opened at 11:00 a.m. When they entered Location 1, they noticed the lobby
14 area of the store had no shelves and there was no merchandise displayed for sale to the
15 public. It did not appear that INNOVATION BEST was selling anything from the store,
16 but instead was purchasing products from people coming into the store and then sending
17 the products elsewhere.

18 46. The detectives observed two females working behind a Plexiglas window.
19 One female was later identified as Cristina Perju (via LeadsOnline). Behind the window,
20 detectives could see several make-shift, semi-permanent walls. The walls appeared to be
21 foil-lined insulation boards held together with duct tape. Detectives observed Perju assist
22 the first people in line, a male and female, who carried large bags filled with what
23 appeared to be bottles of supplements and vitamins. The detectives could not hear the
24 conversation or observe how much money the couple were given for their items. The next
25 two men appeared to be transients. The men had several brand-new canisters of Similac
26 baby formula. The detectives found it odd that two apparently transient men would have
27 several brand-new canisters of baby formula, and that a pawn shop would be interested in
28 buying these items.

1 47. As the two transients waited in line for the couple to finish their transaction,
2 a third male entered the store and approached the two transient males. This male placed a
3 plastic grocery type bag on the ground next to the Similac. Detectives could not see what
4 was inside the bag, but heard the man ask one of the transients to sell the items for him.
5 After this, the unknown male saw the detectives standing nearby, then turned and
6 abruptly left with his bag.

7 48. As detectives were speaking with employees, another male entered the
8 building with a large, reusable style grocery bag. The detectives recognized the man as
9 Todd Sherman, who they knew due to his extensive pawn history. From LeadsOnline,
10 detectives found that Sherman has pawned 239 times dating back to February 2017.
11 Typically, his transactions included vitamins, supplements, and Hydro Flask bottles. On
12 May 16, it appeared that Sherman's bag was filled with Rainbow Light vitamins,
13 supplements, and at least two Hydro Flask bottles. A LeadsOnline search later revealed
14 that on May 16, Sherman had sold two Klean Kanteen water bottles, five Hydro Flask
15 water bottles, workout supplements, and vitamins, receiving a total of \$217. From the
16 items detectives could identify on LeadsOnline, they calculated that the May 16 items
17 were valued at approximately \$575.

18 49. **Interaction: May 28, 2019.** On May 28, 2019, Detectives Lind and Ernst
19 returned to Location 1 and observed people entering and leaving the store for
20 approximately one hour. They observed several people enter Location 1 carrying large,
21 reusable grocery bags which appeared to be filled with items, or carrying items in their
22 arms. In one instance Detective Lind and Ernst observed a Kia Optima arrive and back
23 into a parking spot near the entrance to INNOVATION BEST. The detectives observed
24 the Kia driver exit the car and change his shirt. A few minutes later, a Chevrolet Equinox
25 arrived and parked in front of the Kia. The male driver of the Chevrolet exited his vehicle
26 and met the Kia driver. Both males took several items from the Kia's trunk, which
27 detectives were unable to see. Both men entered Location 1 and came out a few minutes
28 later. Detectives observed the Chevrolet driver take several bills from his pants pocket

1 and appeared to count it, after which he gave part of the money to the driver of the Kia.
2 When the exchange was done, both men drove away. Based on their observations and
3 knowledge of retail theft and illicit pawnshops, the detectives surmised that the driver of
4 the Kia had asked the driver of the Chevrolet to pawn certain items for him, splitting the
5 proceeds.

6 50. **Interaction: May 29, 2019.** On May 29, 2019, Auburn Detectives Ernst
7 and Lind went to Innovation Best in an attempt to recover several items identified by
8 Detective Mattson as stolen property related to a past case. Upon arrival, the detectives
9 found the southernmost door to Innovation Best unlocked and upon entry the entire lobby
10 area was empty, no shelves or merchandise displayed for sale. Detective Ernst and Lind
11 approached the Plexiglas window and were greeted by two females, identified as Diana
12 Bumbu and Cristina Perju. Perju was asked if she was a clerk or manager and she said
13 she was new, but Bumbu was essentially the manager as she had been working there
14 longer. It was noted both female clerks had thick eastern European accents. While
15 speaking with them, the detectives observed that Plexiglas window had a printed sign that
16 said, "We buy items \$15 and Higher." Just beyond the Plexiglas window they observed
17 several large boxes completely filled with new and unopened bottles of over the counter
18 medications. The walls inside the Plexiglas area appeared to be semi-permanent, held up
19 with tape and constructed of aluminum lined plastic or cardboard. Based on their visits,
20 detectives have observed that neither of the two physical storefronts (Locations 1 and 3)
21 sells products to the public from those physical locations. In our collective experience,
22 this is unlike typical pawn shops, where products are displayed on shelves for customers
23 to walk in, browse, and make purchases.

24 **F. Amazon Sales and Business Records**

25 51. In June 2019, investigators received partial sales records from Amazon
26 related to this case, which have been reviewed by an FBI financial analyst. These records
27 have allowed the analyst to prepare a preliminary financial snapshot of the online sales
28 conducted on Amazon by members of the conspiracy, and financial disbursements from

1 Amazon to bank accounts in the name Alexander PAVLOVSKIY (or derivations of his
2 name). The Amazon records show that THRIFT ELECTRO has had an account with
3 Amazon since 2013. The contact name on the Amazon account is Alex PAVLOVSKIY.
4 Amazon records show two email addresses for this account: a “selling dispute email” of
5 thriftelectro@gmail.com, and a “selling business email” of pavalexiys@comcast.net. One
6 of the seller names associated with THRIFT ELECTRO (the name that appears on an
7 Amazon screen as the seller) was “Bestforyouall.”

8 52. **Bank Information.** For online sales associated with “Bestforyouall,”
9 Amazon records show payments going from Amazon to an account at Wells Fargo Bank
10 under the name THRIFT ELECTRO, and to two US Bank accounts: one in the name
11 Aleksandr PAVLOVSKIY and one in the name THRIFT ELECTRO. Amazon’s sales
12 records show that between 2013 and January 2019, Amazon disbursed a total of
13 \$2,127,264 to these three bank accounts for sales registered to “Bestforyouall.”

14 53. Amazon records show a separate business sales account in the name of
15 EURODEALS, LLC. The name on this account is “Aleks/Freeshipforyou.” The email
16 associated with this account is eurodeals.llc@gmail.com. Amazon records show a Wells
17 Fargo bank account listed for this account in the name Eurodeals LLC. Amazon’s sales
18 records show that, between May 2017 and May 2019, Amazon disbursed a total of
19 \$199,173 to EURODEALS, LLC for sales registered to “Freeshipforyou.”

20 54. To get a sense of current items for sale by businesses associated with this
21 conspiracy, I looked at Amazon’s website on June 5, 2019, and found a “NEST”
22 thermostat for sale on that day listed as “New,” with a sales price of \$282, and the seller
23 listed as “Freeshipforyou.” The seller, “Freeshipforyou,” showed a total of 117 total
24 ratings from apparent buyers on Amazon’s website, giving it a 94% positive rating. On
25 June 6, 2019, a Department of Justice associate conducted a search of all items currently
26 for sale on Amazon by the seller “Freeshipforyou.” This search revealed that on June 6,
27 Amazon was selling at least 44 items by “Freeshipforyou.” Of these, 38 items were listed
28 as “new.” Of the remaining items, one was listed as “item is new but packaging is

1 slightly damaged.” Five items were listed as “collectible, like new.” The total “for sale”
2 value of all 44 items was \$2,122.63.

3 **55. Fulfillment Centers.** Amazon has also provided records related to the
4 fulfillment centers used in this case. Fulfillment centers are essentially warehouses where
5 Amazon stores items for sale to customers. Amazon stores items shipped by its third-
6 party sellers such as “Bestforyouall” and “Freeshipforyou” at these fulfillment centers,
7 which are located around the United States. In June 2019, Amazon provided records for
8 the entities “Bestforyouall” and Freeshipforyou.” On two randomly selected dates, May
9 23, 2019 and June 5, 2019, “Bestforyouall” had items for sale in at least five different
10 Amazon.com fulfillment centers: in Fort Worth, Texas; Baltimore, Maryland;
11 Robbinsville, New Jersey; San Bernardino, California; and Middletown, Delaware.

12 **56. Amazon Third-Party Seller Requirements.** I know from training and
13 experience that Amazon has several requirements in order to be a “seller” on its public
14 forum. In order to register for a seller’s account (which requires a fee depending on the
15 type of seller an individual or business elects to be), Amazon requires a business name,
16 address, and current contact information. Amazon also requires an internationally
17 chargeable credit card (or linked bank account) with a valid billing address, a current and
18 accurate phone number, and tax identity information.

19 **57. Amazon Records for Alexander Pavlovskiy.** Auburn police spoke with
20 an Amazon Loss Prevention Officer, who informed them that he had reviewed other
21 Amazon records and observed that Alexander PAVLOVSKIY, in addition to Thrift-
22 Electro, was the account holder/operator on two other businesses offering items for sale
23 on Amazon. Those businesses were “Farless Wholesale” and “RT Trading, LLC.”
24 According to Amazon records, these business entities had shipped products to, and stored
25 products in, at least thirteen Amazon distribution centers around the United States (i.e.,
26 not in Washington State), and has offered more than 100,000 individual items for sale
27 since 2013. Estimated revenue from Amazon sales, for entities associated with
28 Aleksander PAVLOVSKIY, was at least ten million dollars (\$10,000,000) since 2013. I

1 am awaiting final Amazon records, which will need to be audited, for a total, accurate
2 dollar value.

3 **G. US Postal Service Records**

4 58. In June 2019, US Postal Inspection Service (USPIS) Agent Amy Kerkof
5 visited the Kent, Washington U.S. Postal Service facility to review records related to the
6 business entities in this case. She examined packages which had been picked up at the
7 Kent Warehouse (Location 2), and was able to identify tracking numbers and customer
8 identification numbers. Using this information, a USPIS analyst determined that four
9 businesses (identified by USPIS as Innovation Best, BuyTrade, Eurodeals, and Honeybee
10 Marketplace), delivered 10,071 parcels of mail from the Kent warehouse (Location 1)
11 between April 26, 2019 and June 21, 2019, to addresses around the United States.

12 **H. Summary of Probable Cause.**

13 59. **Location 2: Warehouse and Office premises:** Based on my and other
14 investigators' observations of the Kent warehouse/office space (Location 2), and the
15 totality of circumstances described in this affidavit, I and other investigators have
16 concluded that Location 2 serves as both a storage and consolidation center (where stolen
17 items are stored, consolidated, and logged, likely in batches of similar products), a
18 shipment center (where stolen items are shipped out via USPS, UPS, and other delivery
19 services), and an operations center, where employees conduct the internet-based work
20 described in this paragraph and elsewhere in this affidavit. Among the factors leading to
21 this conclusion is pole camera footage and direct police surveillance (including my own),
22 during which we could see several people regularly entering Location 2 (the
23 warehouse/office) and staying during the day, as if it was a typical office space. In
24 addition, on every Friday for which there was surveillance or pole camera footage,
25 investigators observed Alexander PAVLOSKIY drive the van (Vehicle 1) out of Location
26 2 in the early morning (around 0700), to Location 1, appear to pack the van with
27 products, and return to Location 2, where he would back the van into Location 2, after
28

1 | which, someone would close the door behind him. Investigators never saw anyone else
2 | driving Vehicle 1 at any time during this investigation, and never saw Vehicle 1 used for
3 | anything else besides transporting property between business locations. Moreover,
4 | Amazon records show that this conspiracy has sold tens of thousands of retail products on
5 | Amazon.com between 2013 and June 2019. I know that selling items on Amazon requires
6 | use of the internet, and requires someone to log each product, create a product
7 | description, display photos, provide customer feedback, ensure payment, and numerous
8 | other tasks. Selling more than one hundred thousand individual items, as appears to have
9 | occurred in this case, requires the work of many people, all of whom require internet
10 | access and office space to conduct this business.

11 | **60. Location 4: Residence of Alexander Pavlovskiy.** Based upon King
12 | County real estate records, which FBI agents and analysts have reviewed,
13 | ALEKSANDER PAVLOVSKIY and NADEZHDA PAVLOVSKAYA purchased
14 | Location 4 on June 1, 2018 for \$450,000. As of June 2019, they carry a mortgage on the
15 | residence of \$427,500. FBI agents conducted surveillance of Location 4 on June 25, 2019
16 | (beginning at approximately 06:20 a.m.) and June 27, 2019 (beginning at approximately
17 | 06:30 a.m.). On both dates, at approximately 08:30 a.m., agents observed DEMYAN
18 | PAVLOVSKIY, the son of Aleksander, leave the residence. Also on both dates, at around
19 | 10:00 a.m., agents observed ALEKSANDER PAVLOVSKIY leave the residence driving
20 | a black Toyota Camry, Washington license plate number ANV0775, which is registered
21 | to ALEKSANDER PAVLOVSKIY and NEDEZHDA PAVLOVSKAYA at a different
22 | address (12420 SE 264th St, Kent). On both dates, agents observed a maroon Honda
23 | Accord parked in the driveway with Washington license BFP1024, which, according to
24 | Washington DOL records, is registered to ALEKSANDER PAVLOVSKIY at this
25 | residence (Location 4). On June 10, 2019, I conducted surveillance of Location 4, when I
26 | observed the black Toyota Camry (WA plate ANV0775) parked on the front side lawn of
27 | the residence. Also on June 10, I observed the Honda Accord (WA # BFP1024) parked in
28 | the driveway, and I observed NADEZHDA PAVLOVSKAYA standing outside the

1 vehicle. Based on all these factors, I believe that Aleksander PAVOLVSKIY uses
2 Location 4 as his primary residence.

3 61. Based on my training and experience, I know that individuals often
4 maintain business records at their personal residences, including records of net worth,
5 business ownership, business income (reported and unreported, legal and illegal),
6 invoices, receipts, contracts, account statements, loan documents, tax returns, bank
7 records, correspondence, investment documents, leases, mortgage documents, financial
8 reports, and other documents. I know that these records are routinely stored at personal
9 residences for extended periods, as they are frequently used in financial, tax, business,
10 and legal matters, as well as to prove ownership of assets and for other purposes. As a
11 result, I believe that Aleksander PAVLOVSKIY will maintain similar records at his
12 residence, Location 4. Such records are likely to constitute evidence of the crimes under
13 investigation in this case.

14 62. **Items to be Seized: Retail Products.** In Attachment B, I am seeking
15 authorization to seize "RETAIL PRODUCTS, limited to retail items "new and in original
16 packaging," and including items with "no-resell" stickers and "spider-wrap" as defined in
17 the affidavit. I am unable to be more specific because, as summarized in this affidavit, the
18 nature of this conspiracy involves the daily purchase and sale of hundreds of retail
19 products, and because these retail products differ on a daily basis (as they are bought and
20 sold), and vary widely, to include items such as electronic toothbrushes, aquarium
21 products, automotive air filters, allergy tablets, etc. Auburn detective reviewed
22 LeadsOnline data and attempted to categorize the top retail products bought by the
23 pawnshops involved in this conspiracy. According to their research, these categories
24 appear to be: Vitamin and Health Supplements (non-medicine), Over the Counter
25 Medication, Tools, Home Improvement & Furnishings, Personal Care Products, Makeup
26 & Perfume, Pet Supplies, Sports Equipment & Supplies, Automobile Products, Infant
27 Products, Home and Other Electronics, Small Kitchen Appliances, Computers & audio-
28 visual Equipment, Toys, and Clothing & Accessories. Therefore I am including these

1 categories in Attachment B, "Items to be Seized." Moreover, because the entire enterprise
 2 involves the purchase and sale of stolen retail products, all of which are new and in
 3 original packaging, I am limiting our search request to retail items "new and in original
 4 packaging." I believe that probable cause exists to seize all such items based upon the
 5 totality of evidence outlined in this affidavit.

6 **IV. SEARCH AND SEIZURE OF DIGITAL DEVICES,**
 7 **COMPUTERS, ELECTRONIC STORAGE, AND FORENSIC**
 8 **ANALYSIS**

9 **A. Introduction**

10 63. As described above and in Attachment B, this application seeks permission
 11 to search for evidence, fruits and/or instrumentalities that might be found at Locations 1,
 12 2, 3, and 4, and in Vehicle 1, in whatever form. One form in which the evidence, fruits,
 13 and/or instrumentalities are likely to be found is data stored on digital devices such as
 14 computers, iPads, mobile phones, computer hard drives, or other electronic storage
 15 media. Thus, the warrant applied for would authorize the seizure of digital devices or
 16 other electronic storage media or, potentially, the copying of electronically stored
 17 information from digital devices or other electronic storage media, all under Rule
 18 41(e)(2)(B). "Electronic Storage media," as used in this affidavit, refers to any physical
 19 object upon which data can be recorded. Examples include hard disks, RAM, floppy
 20 disks, flash memory, CD-ROMs, and other magnetic or optical media.

21 64. Based upon my review of the evidence gathered in this investigation, my
 22 review of data and records, information received from other agents and computer
 23 forensics examiners, and my training and experience, I submit that if a digital device or
 24 other electronic storage media is found at Locations 1, 2, 3, and 4, or Vehicle 1, there is
 25 probable cause to believe that evidence, fruits, and/or instrumentalities of the crimes set
 26 forth in paragraph 9, above, will be stored on those digital devices or other electronic
 27 storage media. I believe digital devices or other electronic storage media are being used
 28 to commit these crimes because the totality of the investigation has led me to believe that

1 members of the conspiracy use computers to carry out their daily, criminal activity. For
2 example, the investigation has shown that when people sell products at INNOVATION
3 BEST and THRIFT ELECTRO, store employees log the purchases and sales into an
4 electronic database, LeadsOnline, which is an internet-based system, requiring the use of
5 electronic devices for internet connectivity. Second, Amazon records show that members
6 of the conspiracy, operating under the seller names "Freeshipforyou" and "Bestforyouall"
7 have sold more than one hundred thousand items on Amazon.com between 2013 and
8 2019. These internet sales require members of the conspiracy to prepare sales documents
9 for Amazon, such as a product description, a sales price, the condition of the product, and
10 a contact email, all of which must be sent to Amazon via electronic means. Fourth,
11 Amazon.com records show that the businesses under investigation have emails with
12 Amazon, as specified above, supporting the reasonable inference that Amazon and buyers
13 on Amazon communicate with members of the conspiracy when they have questions
14 about the products, have complaints, wish to return a product, or for other reasons.

15 65. Due to what I know to be the storage capacity of electronic devices, there is
16 probable cause to believe that evidence, fruits, and/or instrumentalities of the crimes
17 specified in Paragraph 9 exists and will be found on digital device or other electronic
18 storage media at all locations because:

- 19 a. Based on my knowledge, training, and experience, I know that
20 computer files or remnants of such files can be preserved (and
21 consequently also then recovered) for months or even years after
22 they have been downloaded onto a storage medium, deleted, or
23 accessed or viewed via the Internet. Electronic files downloaded to
24 a digital device or other electronic storage medium can be stored for
25 years at little or no cost. Even when files have been deleted, they
26 can be recovered months or years later using forensic tools. This is
27 so because when a person "deletes" a file on a digital device or other
28 electronic storage media, the data contained in the file does not
actually disappear; rather, that data remains on the storage medium
until it is overwritten by new data.

- b. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space—that is, in space on the digital device or other electronic storage medium that is not currently being used by an active file—for long periods of time before they are overwritten. In addition, a computer’s operating system may also keep a record of deleted data in a “swap” or “recovery” file.
- c. Wholly apart from user-generated files, computer storage media—in particular, computers’ internal hard drives—contain electronic evidence of how a computer has been used, what it has been used for, and who has used it. To give a few examples, this forensic evidence can take the form of operating system configurations, artifacts from operating system or application operation, file system data structures, and virtual memory “swap” or paging files. Computer users typically do not erase or delete this evidence, because special software is typically required for that task. However, it is technically possible to delete this information.
- d. Similarly, files that have been viewed via the Internet are sometimes automatically downloaded into a temporary Internet directory or “cache.”

66. **Forensic evidence.** As further described in Attachment B, this application seeks permission to locate not only computer files that might serve as direct evidence of the crimes described on the warrant, but also for forensic electronic evidence that establishes how digital devices or other electronic storage media were used, the purpose of their use, who used them, and when. There is probable cause to believe that this forensic electronic evidence will be on any digital devices or other electronic storage media located at Locations 1, 2, 3, and 4, and in Vehicle 1, because:

- a. Stored data can provide evidence of a file that was once on the digital device or other electronic storage media but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems can leave traces of information on the digital device or other electronic storage media that show what tasks and processes were recently active. Web browsers, e-mail programs, and chat programs store configuration information that can reveal information such as online nicknames and passwords. Operating

1 systems can record additional information, such as the history of
2 connections to other computers, the attachment of peripherals, the
3 attachment of USB flash storage devices or other external storage
4 media, and the times the digital device or other electronic storage
5 media was in use. Computer file systems can record information
6 about the dates files were created and the sequence in which they
7 were created.

- 8 b. As explained herein, information stored within a computer and other
9 electronic storage media may provide crucial evidence of the “who,
10 what, why, when, where, and how” of the criminal conduct under
11 investigation, thus enabling the United States to establish and prove
12 each element or alternatively, to exclude the innocent from further
13 suspicion. In my training and experience, information stored within
14 a computer or storage media (e.g., registry information,
15 communications, images and movies, transactional information,
16 records of session times and durations, internet history, and anti-
17 virus, spyware, and malware detection programs) can indicate who
18 has used or controlled the computer or storage media. This “user
19 attribution” evidence is analogous to the search for “indicia of
20 occupancy” while executing a search warrant at a residence. The
21 existence or absence of anti-virus, spyware, and malware detection
22 programs may indicate whether the computer was remotely
23 accessed, thus inculcating or exculpating the computer owner and/or
24 others with direct physical access to the computer. Further,
25 computer and storage media activity can indicate how and when the
26 computer or storage media was accessed or used. For example, as
27 described herein, computers typically contain information that log:
28 computer user account session times and durations, computer
activity associated with user accounts, electronic storage media that
connected with the computer, and the IP addresses through which
the computer accessed networks and the internet. Such information
allows investigators to understand the chronological context of
computer or electronic storage media access, use, and events relating
to the crime under investigation. Additionally, some information
stored within a computer or electronic storage media may provide
crucial evidence relating to the physical location of other evidence
and the suspect. For example, images stored on a computer may both
show a particular location and have geolocation information
incorporated into its file data. Such file data typically also contains
information indicating when the file or image was created. The

1 existence of such image files, along with external device connection
2 logs, may also indicate the presence of additional electronic storage
3 media (e.g., a digital camera or cellular phone with an incorporated
4 camera). The geographic and timeline information described herein
5 may either inculcate or exculpate the computer user. Last,
6 information stored within a computer may provide relevant insight
7 into the computer user's state of mind as it relates to the offense
8 under investigation. For example, information within the computer
9 may indicate the owner's motive and intent to commit a crime (e.g.,
internet searches indicating criminal planning), or consciousness of
guilt (e.g., running a "wiping" program to destroy evidence on the
computer or password protecting/encrypting such evidence in an
effort to conceal it from law enforcement).

- 10 c. A person with appropriate familiarity with how a digital device or
11 other electronic storage media works can, after examining this
12 forensic evidence in its proper context, draw conclusions about how
13 the digital device or other electronic storage media were used, the
purpose of their use, who used them, and when.
- 14 d. The process of identifying the exact files, blocks, registry entries,
15 logs, or other forms of forensic evidence on a digital device or other
16 electronic storage media that are necessary to draw an accurate
17 conclusion is a dynamic process. While it is possible to specify in
18 advance the records to be sought, digital evidence is not always data
19 that can be merely reviewed by a review team and passed along to
20 investigators. Whether data stored on a computer is evidence may
21 depend on other information stored on the computer and the
application of knowledge about how a computer behaves.
Therefore, contextual information necessary to understand other
evidence also falls within the scope of the warrant.
- 22 e. Further, in finding evidence of how a digital device or other
23 electronic storage media was used, the purpose of its use, who used
24 it, and when, sometimes it is necessary to establish that a particular
25 thing is not present. For example, the presence or absence of
26 counter-forensic programs or anti-virus programs (and associated
data) may be relevant to establishing the user's intent.
- 27
28

B. Past Efforts to Obtain Electronically Stored Information.

67. Because of the nature of the evidence that I am attempting to obtain and the nature of the investigation, I have not made any prior efforts to obtain the evidence based on the consent of any party who may have authority to consent. I believe, based upon the nature of the investigation and the information I have received, that if the targets of this investigation become aware of the investigation in advance of the execution of a search warrant, they may attempt to destroy any potential evidence, whether digital or non-digital, thereby hindering law enforcement agents from the furtherance of the criminal investigation.

C. Risk of Destruction of Evidence.

68. I know, based on my training and experience, that digital information can be very fragile and easily destroyed. Digital information can also be easily encrypted or obfuscated such that review of the evidence would be extremely difficult, and in some cases impossible. If an encrypted computer is either powered off or if the user has not entered the encryption password and logged onto the computer, it is likely that any information contained on the computer will be impossible to decipher. If the computer is powered on, however, and the user is already logged onto the computer, there is a much greater chance that the digital information can be extracted from the computer. This is because when the computer is on and in use, the password has already been entered and the data on the computer is accessible. However, giving the owner of the computer time to activate a digital security measure, pull the power cord from the computer, or even log off of the computer could result in a loss of digital information that could otherwise have been extracted from the computer.

D. Seizing Computers and Electronic Devices at Locations 1, 2, and 3, and Vehicle 1, as Instrumentalities of the Crimes.

69. This is an internet-based conspiracy that is permeated with fraud and illegality. As a result, there is probable cause to believe that computers and electronic

1 devices found at Locations 1, 2, and 3, and in Vehicle 1, are instrumentalities of the
2 crimes specified in paragraph above (conspiracy, transportation of stolen property, sale of
3 stolen property, and money laundering). The investigation summarized above has led me
4 to believe that members of the conspiracy use computers to carry out their daily, criminal
5 activity in at least three respects. First, the investigation has shown that when people sell
6 their products to employees at INNOVATION BEST and THRIFT ELECTRO, store
7 employees log the purchases and sales into an electronic database, LeadsOnline, that is an
8 internet-based system, requiring the use of electronic devices for internet connectivity.
9 Second, Amazon.com records show that members of the conspiracy, operating under the
10 seller names "Freeshipforyou" and "Bestforyouall," among others, have sold tens of
11 thousands of items on Amazon going back to 2013. These internet sales require members
12 of the conspiracy to prepare sales documents for Amazon, such as a product description,
13 a sales price, the condition of the product, and a contact email, all of which must be
14 communicated to Amazon by electronic means. Third, in a business moving tens of
15 thousands of items, electronic, backup business records would be required, or are
16 commonly used. These backups would likely consist of inventory, sales records, financial
17 transactions, electronic profiles, electronic storefronts, banking information, and business
18 records. These backups would need to be stored, in conjunction with the electronics
19 either in daily use, or via independent methods such as external hard drives, USB's, or
20 paper files. Locations 1, 2, and 3, and Vehicle 1, are business locations for this
21 conspiracy, and therefore, computers and electronic devices found at these locations are
22 likely to be permeated with fraud and used as instrumentalities of the crimes under
23 investigation.

24 **E. Request for Authority to Conduct Off-Site Search of Computers and**
25 **Electronic Devices Seized from Location 4.**

26 70. Because several people share Location 4 as a residence, it is possible that
27 Location 4 will contain digital devices or other electronic storage media that are
28 predominantly used, and perhaps owned, by persons who are not suspected of a crime. If

1 agents conducting the search nonetheless determine that it is possible that the things
2 described in this warrant could be found on those computers, this application seeks
3 permission to search and if necessary to seize those computers as well. It may be
4 impossible to determine, on scene, which computers contain the things described in this
5 warrant. Accordingly, as to Location 4 only, agents will use the following processes:

- 6 a. Upon securing Location 4, the search team will conduct an initial
7 review of any digital devices or other electronic storage media located at
8 Location 4 that are capable of containing data or items that fall within
9 the scope of Attachment B to this Affidavit, to determine if it is possible
10 to secure the data contained on these devices onsite in a reasonable
11 amount of time and without jeopardizing the ability to accurately
12 preserve the data.
- 13 b. In order to examine the electronically stored information (“ESI”) in a
14 forensically sound manner, law enforcement personnel with appropriate
15 expertise will attempt to produce a complete forensic image, if possible
16 and appropriate, of any digital device or other electronic storage media
17 that is capable of containing data or items that fall within the scope of
18 Attachment B to this Affidavit.
- 19 c. A forensic image may be created of either a physical drive or a logical
20 drive. A physical drive is the actual physical hard drive that may be
21 found in a typical computer. When law enforcement creates a forensic
22 image of a physical drive, the image will contain every bit and byte on
23 the physical drive. A logical drive, also known as a partition, is a
24 dedicated area on a physical drive that may have a drive letter assigned
25 (for example the c: and d: drives on a computer that actually contains
26 only one physical hard drive). Therefore, creating an image of a logical
27 drive does not include every bit and byte on the physical drive. Law
28 enforcement will only create an image of physical or logical drives
physically present on or within the subject device. Creating an image of
the devices located at the search locations described in Attachments A-1
to 5 will not result in access to any data physically located elsewhere.
However, digital devices or other electronic storage media at Location 4
that have previously connected to devices at other locations may contain
data from those other locations.

- 1 d. If, based on their training and experience, and the resources available to
2 them at the search site, the search team determines it is not practical to
3 make an on-site image within a reasonable amount of time and without
4 jeopardizing the ability to accurately preserve the data, then the digital
5 devices or other electronic storage media will be seized and transported
6 to an appropriate law enforcement laboratory to be forensically imaged
7 and reviewed.

8 71. In lieu of removing all of these items from Location 4, it is sometimes
9 possible to make an image copy of the data on the digital devices or other electronic
10 storage media, onsite. Generally speaking, imaging is the taking of a complete electronic
11 picture of the device's data, including all hidden sectors and deleted files. Either seizure
12 or imaging is often necessary to ensure the accuracy and completeness of data recorded
13 on the item, and to prevent the loss of the data either from accidental or intentional
14 destruction. This is true because of the following:

- 15 a. The time required for an examination. As noted above, not all
16 evidence takes the form of documents and files that can be easily
17 viewed on site. Analyzing evidence of how a computer has been
18 used, what it has been used for, and who has used it requires
19 considerable time, and taking that much time on premises could be
20 unreasonable. As explained above, because the warrant calls for
21 forensic electronic evidence, it is exceedingly likely that it will be
22 necessary to thoroughly examine the respective digital devices
23 and/or electronic storage media to obtain evidence. Computer hard
24 drives, digital devices and electronic storage media can store a large
25 volume of information. Reviewing that information for things
26 described in the warrant can take weeks or months, depending on the
27 volume of data stored, and would be impractical and invasive to
28 attempt on-site.
- b. Technical requirements. Digital devices or other electronic storage
media can be configured in several different ways, featuring a
variety of different operating systems, application software, and
configurations. Therefore, searching them sometimes requires tools
or knowledge that might not be present on the search site. The vast
array of computer hardware and software available makes it difficult
to know before a search what tools or knowledge will be required to
analyze the system and its data on the premises. However, taking the

1 items off-site and reviewing them in a controlled environment will
2 allow examination with the proper tools and knowledge.

- 3 c. Variety of forms of electronic media. Records sought under this
4 warrant could be stored in a variety of electronic storage media
5 formats and on a variety of digital devices that may require off-site
6 reviewing with specialized forensic tools.

7 72. Based on the foregoing, and consistent with Rule 41(e)(2)(B) of the Federal
8 Rules of Criminal Procedure, the warrant I am applying for will permit seizing, imaging,
9 or otherwise copying digital devices or other electronic storage media that reasonably
10 appear capable of containing some or all of the data or items that fall within the scope of
11 Attachment B to this Affidavit, and will specifically authorize a later review of the media
12 or information consistent with the warrant.

13 V. REQUEST FOR SEALING

14 73. It is respectfully requested that this Court issue an order sealing, until
15 further order of the Court, all papers submitted in support of this application, including
16 the application, affidavit and search warrant. I believe that sealing this document is
17 necessary because the items and information to be seized are relevant to an ongoing
18 investigation, and therefore, disclosure of the search warrant, this affidavit, and/or this
19 application and the attachments thereto, will jeopardize the investigation. Disclosure of
20 these materials would give the target of the investigation an opportunity to destroy
21 evidence, change patterns of behavior, notify confederates, or flee from prosecution.

22 //

23 //

24 //

25 //

26 //

1 **VI. CONCLUSION**

2 74. Based on the above, there is probable cause to believe that evidence, fruits,
 3 and instrumentalities of the crimes of interstate transportation in stolen goods, sale of
 4 stolen goods in interstate commerce, conspiracy to commit these offenses, and money
 5 laundering, in violation of 18 U.S.C. § 2314, 2315, 371, and 1956, which are more fully
 6 described in Attachment B, exist and are present in the locations to be searched and
 7 described in Attachments A-1 to 5, as well as on any digital devices or other electronic
 8 storage media found at these locations. I therefore request that the court issue a warrant
 9 authorizing a search of the Locations and Vehicle specified above (in paragraphs 10-14),
 10 as well as any computers, digital devices, and electronic storage media located therein,
 11 for the items more fully described in Attachment B hereto, incorporated herein by
 12 reference, and the seizure of any such items found therein.

13
 14 
 15 ARIANA KROSHINSKY, Affiant
 16 Special Agent, Federal Bureau of Investigation

17 SUBSCRIBED AND SWORN before me this 8th day of July, 2019

18
 19 
 20 MARY ALICE THEILER
 21 United States Magistrate Judge
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ATTACHMENT A-1
Location 1 to be Searched

The Business Premises of 25628 and 25630 102nd Pl SE, Kent, Washington

Location 1 is located at 25628 and 25630 102nd Pl SE, Kent, Washington. It consists of two-adjoined units within a multi-business, strip-mall complex. Location 1 has two access doors and three exterior windows facing a parking lot. Above the left entrance door are the numbers 25628, and above the right entrance door, the numbers 25630. Further above the entrance doors are two signs. The sign to the left reads, in red lettering, "Hardware," with a smaller sign beneath it reading "Store." The sign to the right reads, in gold lettering, "Gold and Silver," with a smaller sign beneath it reading, "We Buy." To the left of Location 1, in the corner of the strip mall, is a business labeled "Carriage Square Bar & Grill." To the right of Location 1 is a barber shop with a sign listing it as "Emily Barber." A photo of Location 1 is below.



ATTACHMENT A-2
Location 2 to be Searched

A Storage and Office Premises located at 22710 72nd Avenue South, Suite 109, Kent, Washington 98032

Location 2 is a storage facility and adjacent office premises. It is a grey, one-story unit at the eastern end of a longer building. Location 2, the unit to be searched, has two rolling doors permitting delivery trucks to back up and load and unload goods. The left side roll-up door is off the ground and permits large trucks to back up to it. The right side roll-up door is accessed via a ramp, allowing vehicles to back into the storage facility and close the door behind them. These rolling doors are visible from South 228th Street. To the right of the delivery doors is a one-story office space, entered via a glass door with a white frame. To the right of this entry door are several windows. There is a small parking lot in front of Location 2, with space for approximately ten vehicles. A photo of location 2 is below,



ATTACHMENT A-3
Location 3 to be Searched

A Business Location at 20 Southwest 7th Street, Unit J, Renton, Washington 98057

Location 3 is one unit within a single-story, retail strip mall, known as the “Curran business complex.” Location 3 has a single, tinted-glass entry door facing an east parking lot. Next to the front door is a set of ground to ceiling tinted windows which abut the front sidewalk. A sign above the entry door reads, in red lettering, “Thrift-Electro.” Below this, a smaller sign reads, “We Buy,” in yellow lettering within a black oval. Above the front door is a small sticker with the letter J in black color. To the right of Location 3 is an unrelated unit with a sign labeled, “A-Health.” A photo of location 3 is below.



ATTACHMENT A-4
Location 4 to be Searched

A single-family residence located at 30323 – 110th Place S.E., Auburn, Washington 98092. Location 4 is a two-story, four-bedroom, single-family residence, painted grey/green in color with white trim and a grey asphalt roof. From the street, a driveway leads to a two-car, white garage door, which faces the street. To the right of the garage door is a porch that runs from the garage to the right side of the house. The porch has several white pillars and a white fence. The front door, white in color, is in the center of the front porch. Above the front porch are three dormers and windows. For this location, the search is to include all rooms, attics, basements, and all other parts therein, and surrounding yard, garages, storage rooms, or outbuildings of any kind, attached or unattached, on Location 4. A photo of Location 4 is below.



ATTACHMENT B (LOCATION 4)
ITEMS TO BE SEIZED

The following records, documents, files, or materials, in whatever form, including handmade or mechanical form (such as printed, written, handwritten, or typed); photocopies or other photographic form; and electrical, electronic, and magnetic form (such as tapes, cassettes, hard disks, floppy disks, diskettes, compact discs, CD-ROMs, DVDs, optical discs, Zip cartridges, printer buffers, smart cards, electronic notebooks, mobile phones, or any other electronic storage medium) that constitute evidence, instrumentalities, or fruits of violations of 18 U.S.C. § 2314 (Transportation of stolen goods in interstate commerce); 18 U.S.C. § 2315 (Sale of stolen goods in interstate commerce); 18 U.S.C. § 371 (Conspiracy); and 18 U.S.C. §§ 1956 (Money laundering), including:

1. **DOCUMENTS and RECORDS**, whether handwritten, printed, typed, or contained in a computer or electronic memory, to include:
 - a. Business records for THRIFT ELECTRO, INNOVATION BEST, EURODEALS, LLC., BUY-TRADE, (or derivations of this name such as BY-TRADE, etc.), "Freeshipforyou," Bestforyouall," Farless Wholesale, RT Trading, LLC, Honeybee Marketplace, and any other pawnshop or business;
 - b. purchase and sales records for retail goods;
 - c. types, amounts, and prices of retail products bought and sold, as well as dates, places, and amounts of specific transactions;
 - d. records related to people from whom retail products were bought (including names, addresses, phone numbers, or other identifying information);
 - e. bank records, checks, credit card bills, account information, and other financial records;
 - f. tax returns, tax records, and documents prepared for tax purposes;
 - g. communications with Amazon.com;

- h. inventories, delivery records, shipping labels, logs and records related to United Parcel Service (UPS), the US Postal Service, or any other delivery service or third party mailing service (such as Stamps.com, etc.), and mailing materials, including but not limited to boxes, envelopes, labels, packages, and similar materials;
- i. customer lists and communications with customers;
- j. indicia of occupancy and ownership of the premises and vehicles described in this search warrant including, but not limited to, utility bills, telephone bills, cancelled envelopes, registration certificates, vehicle titles, and leasing and rental records.

2. **FINANCIAL RECORDS:** Financial records of THRIFT ELECTRO, INNOVATION BEST, EURODEALS, LLC., BUY-TRADE (or derivations of this name such as BY-TRADE, etc.), "Freeshipforyou," Bestforyouall," Farless Wholesale, RT Trading LLC, Honeybee Marketplace, and any other businesses, including but not limited to: records relating to the purchase and sale of retail products, records of funds received from Amazon.com, bank records relating to accounts owned or controlled by Aleksander PAVLOVSKIY (or derivations of that name, including but not limited to Alex PAVLOVSKIY and A. PAVLOVSKIY); records relating to receipts and disbursements of cash, and records related to income and expenses.

3. **RETAIL PRODUCTS,** limited to new and in original packaging retail items, and including items with "no-resell" stickers and "spider-wrap" as defined in the affidavit, and including the following categories of products: Vitamin and Health Supplements (non-medicine), Over the Counter Medication, Tools, Home Improvement & Furnishing items, Personal Care Products, Makeup & Perfume, Pet Supplies, Sports Equipment & Supplies, Automobile Products, Infant Products, Home and Other Electronics, Small Kitchen Appliances, Computers & Audio-Visual Equipment, Toys, and Clothing & Accessories.

4. **MONEY,** including U.S. currency, negotiable instruments, securities, or other tangible or intangible property of value.

1 5. **DIGITAL DEVICES**¹ or other electronic storage media² and/or their
2 components, which include:

- 3 a. Any digital device or other electronic storage media capable of being
4 used to commit, further, or store evidence of the offenses listed
5 above;
- 6 b. Any digital devices or other electronic storage media used to
7 facilitate the transmission, creation, display, encoding or storage of
8 data, including word processing equipment, modems, docking
9 stations, monitors, cameras, printers, plotters, encryption devices,
10 and optical scanners;
- 11 c. Any magnetic, electronic or optical storage device capable of storing
12 data, such as floppy disks, hard disks, tapes, CD-ROMs, CD-R, CD-
13 RWs, DVDs, optical disks, printer or memory buffers, smart cards,
14 PC cards, memory calculators, electronic dialers, electronic
15 notebooks, and personal digital assistants;
- 16 d. Any documentation, operating logs and reference manuals regarding
17 the operation of the digital device or other electronic storage media
18 or software;
- 19 e. Any applications, utility programs, compilers, interpreters, and other
20 software used to facilitate direct or indirect communication with the
21 computer hardware, storage devices, or data to be searched;
- 22 f. Any physical keys, encryption devices, dongles and similar physical
23 items that are necessary to gain access to the computer equipment,
24 storage devices or data; and

25 ¹ "Digital device" includes any device capable of processing and/or storing data in electronic form, including, but
26 not limited to: central processing units, laptop, desktop, notebook or tablet computers, computer servers, peripheral
27 input/output devices such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable
28 media, related communications devices such as modems, routers and switches, and electronic/digital security
29 devices, wireless communication devices such as mobile or cellular telephones and telephone paging devices,
30 personal data assistants ("PDAs"), iPods/iPads, Blackberries, digital cameras, digital gaming devices, global
31 positioning satellite devices (GPS), or portable media players.

32 ² Electronic Storage media is any physical object upon which electronically stored information can be recorded.
33 Examples include hard disks, RAM, floppy disks, flash memory, CD-ROMs, and other magnetic or optical media.

1 g. Any passwords, password files, test keys, encryption codes or other
2 information necessary to access the computer equipment, storage
3 devices or data.

4 6. Any digital devices or other electronic storage media that were or may have
5 been used as a means to commit the offenses described on the warrant.

6 7. For any digital device or other electronic storage media upon which
7 electronically stored information that is called for by this warrant may be contained, or
8 that may contain things otherwise called for by this warrant:

9 a. evidence of who used, owned, or controlled the digital device or
10 other electronic storage media at the time the things described in this
11 warrant were created, edited, or deleted, such as logs, registry
12 entries, configuration files, saved usernames and passwords,
13 documents, browsing history, user profiles, email, email contacts,
14 "chat," instant messaging logs, photographs, and correspondence;

15 b. evidence of software that would allow others to control the digital
16 device or other electronic storage media, such as viruses, Trojan
17 horses, and other forms of malicious software, as well as evidence of
18 the presence or absence of security software designed to detect
19 malicious software;

20 c. evidence of the lack of such malicious software;

21 d. evidence of the attachment to the digital device of other storage
22 devices or similar containers for electronic evidence;

23 e. evidence of counter-forensic programs (and associated data) that are
24 designed to eliminate data from the digital device or other electronic
25 storage media;

26 f. evidence of the times the digital device or other electronic storage
27 media was used;

28 g. passwords, encryption keys, and other access devices that may be
 necessary to access the digital device or other electronic storage
 media;

- h. documentation and manuals that may be necessary to access the digital device or other electronic storage media or to conduct a forensic examination of the digital device or other electronic storage media;
- i. contextual information necessary to understand the evidence described in this attachment.

8. Records evidencing the use of an Internet Protocol address to communicate with Amazon.com and to record and log data, including:

- a. routers, modems, and network equipment used to connect computers to the Internet;
- b. records of Internet Protocol addresses used;
- c. records of Internet activity, including firewall logs, caches, browser history and cookies, "bookmarked" or "favorite" web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses.

THE SEIZURE OF DIGITAL DEVICES OR OTHER ELECTRONIC STORAGE MEDIA AND/OR THEIR COMPONENTS AS SET FORTH HEREIN IS SPECIFICALLY AUTHORIZED BY THIS SEARCH WARRANT, FOR THE PURPOSE OF PRODUCING AN ON-SITE, COMPLETE FORENSIC IMAGE OF THE CONTENTS OF SAID MEDIA, AND FOR CONDUCTING OFF-SITE EXAMINATIONS OF THEIR CONTENTS FOR EVIDENCE, INSTRUMENTALITIES, OR FRUITS OF THE AFOREMENTIONED CRIMES, IF IT IS NOT PRACTICAL TO MAKE AN ON-SITE IMAGE IN A REASONABLE AMOUNT OF TIME.

ATTACHMENT A-5
Vehicle to be Searched

Vehicle 1: A Grey, Mercedes Benz, "Sprinter" model transport van, Washington State
license plate number C20127G, VIN # WD4PE8DD8GP234633.

ATTACHMENT B
ITEMS TO BE SEIZED

The following records, documents, files, or materials, in whatever form, including handmade or mechanical form (such as printed, written, handwritten, or typed); photocopies or other photographic form; and electrical, electronic, and magnetic form (such as tapes, cassettes, hard disks, floppy disks, diskettes, compact discs, CD-ROMs, DVDs, optical discs, Zip cartridges, printer buffers, smart cards, electronic notebooks, mobile phones, or any other electronic storage medium) that constitute evidence, instrumentalities, or fruits of violations of 18 U.S.C. § 2314 (Transportation of stolen goods in interstate commerce); 18 U.S.C. § 2315 (Sale of stolen goods in interstate commerce); 18 U.S.C. § 371 (Conspiracy); and 18 U.S.C. §§ 1956 (Money laundering), including:

1. **DOCUMENTS and RECORDS**, whether handwritten, printed, typed, or contained in a computer or electronic memory, to include:
 - a. Business records for THRIFT ELECTRO, INNOVATION BEST, EURODEALS, LLC., BUY-TRADE, (or derivations of this name such as BY-TRADE, etc.), "Freeshipforyou," Bestforyouall," Farless Wholesale, RT Trading, LLC, Honeybee Marketplace, and any other pawnshop or business;
 - b. purchase and sales records for retail goods;
 - c. types, amounts, and prices of retail products bought and sold, as well as dates, places, and amounts of specific transactions;
 - d. records related to people from whom retail products were bought (including names, addresses, phone numbers, or other identifying information);
 - e. bank records, checks, credit card bills, account information, and other financial records;
 - f. tax returns, tax records, and documents prepared for tax purposes;
 - g. communications with Amazon.com;

- h. inventories, delivery records, shipping labels, logs and records related to United Parcel Service (UPS), the US Postal Service, or any other delivery service or third party mailing service (such as Stamps.com, etc.), and mailing materials, including but not limited to boxes, envelopes, labels, packages, and similar materials;
- i. customer lists and communications with customers;
- j. indicia of occupancy and ownership of the premises and vehicles described in this search warrant including, but not limited to, utility bills, telephone bills, cancelled envelopes, registration certificates, vehicle titles, and leasing and rental records.

2. **FINANCIAL RECORDS:** Financial records of THRIFT ELECTRO, INNOVATION BEST, EURODEALS, LLC., BUY-TRADE (or derivations of this name such as BY-TRADE, etc.), "Freeshipforyou," Bestforyouall," Farless Wholesale, RT Trading LLC, Honeybee Marketplace, and any other businesses, including but not limited to: records relating to the purchase and sale of retail products, records of funds received from Amazon.com, bank records relating to accounts owned or controlled by Aleksander PAVLOVSKIY (or derivations of that name, including but not limited to Alex PAVLOVSKIY and A. PAVLOVSKIY); records relating to receipts and disbursements of cash, and records related to income and expenses.

3. **RETAIL PRODUCTS,** limited to new and in original packaging retail items, and including items with "no-resell" stickers and "spider-wrap" as defined in the affidavit, and including the following categories of products: Vitamin and Health Supplements (non-medicine), Over the Counter Medication, Tools, Home Improvement & Furnishing items, Personal Care Products, Makeup & Perfume, Pet Supplies, Sports Equipment & Supplies, Automobile Products, Infant Products, Home and Other Electronics, Small Kitchen Appliances, Computers & Audio-Visual Equipment, Toys, and Clothing & Accessories.

4. **MONEY,** including U.S. currency, negotiable instruments, securities, or other tangible or intangible property of value.

1 5. **DIGITAL DEVICES**¹ or other electronic storage media² and/or their
2 components, which include:

- 3 a. Any digital device or other electronic storage media capable of being
4 used to commit, further, or store evidence of the offenses listed
5 above;
- 6 b. Any digital devices or other electronic storage media used to
7 facilitate the transmission, creation, display, encoding or storage of
8 data, including word processing equipment, modems, docking
9 stations, monitors, cameras, printers, plotters, encryption devices,
10 and optical scanners;
- 11 c. Any magnetic, electronic or optical storage device capable of storing
12 data, such as floppy disks, hard disks, tapes, CD-ROMs, CD-R, CD-
13 RWs, DVDs, optical disks, printer or memory buffers, smart cards,
14 PC cards, memory calculators, electronic dialers, electronic
15 notebooks, and personal digital assistants;
- 16 d. Any documentation, operating logs and reference manuals regarding
17 the operation of the digital device or other electronic storage media
18 or software;
- 19 e. Any applications, utility programs, compilers, interpreters, and other
20 software used to facilitate direct or indirect communication with the
21 computer hardware, storage devices, or data to be searched;
- 22 f. Any physical keys, encryption devices, dongles and similar physical
23 items that are necessary to gain access to the computer equipment,
24 storage devices or data; and

25 ¹ "Digital device" includes any device capable of processing and/or storing data in electronic form, including, but
26 not limited to: central processing units, laptop, desktop, notebook or tablet computers, computer servers, peripheral
27 input/output devices such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable
28 media, related communications devices such as modems, routers and switches, and electronic/digital security
 devices, wireless communication devices such as mobile or cellular telephones and telephone paging devices,
 personal data assistants ("PDAs"), iPods/iPads, Blackberries, digital cameras, digital gaming devices, global
 positioning satellite devices (GPS), or portable media players.

² Electronic Storage media is any physical object upon which electronically stored information can be recorded.
Examples include hard disks, RAM, floppy disks, flash memory, CD-ROMs, and other magnetic or optical media.

1 g. Any passwords, password files, test keys, encryption codes or other
2 information necessary to access the computer equipment, storage
3 devices or data.

4 6. Any digital devices or other electronic storage media that were or may have
5 been used as a means to commit the offenses described on the warrant.

6 7. For any digital device or other electronic storage media upon which
7 electronically stored information that is called for by this warrant may be contained, or
8 that may contain things otherwise called for by this warrant:

9 a. evidence of who used, owned, or controlled the digital device or
10 other electronic storage media at the time the things described in this
11 warrant were created, edited, or deleted, such as logs, registry
12 entries, configuration files, saved usernames and passwords,
13 documents, browsing history, user profiles, email, email contacts,
14 "chat," instant messaging logs, photographs, and correspondence;

15 b. evidence of software that would allow others to control the digital
16 device or other electronic storage media, such as viruses, Trojan
17 horses, and other forms of malicious software, as well as evidence of
18 the presence or absence of security software designed to detect
19 malicious software;

20 c. evidence of the lack of such malicious software;

21 d. evidence of the attachment to the digital device of other storage
22 devices or similar containers for electronic evidence;

23 e. evidence of counter-forensic programs (and associated data) that are
24 designed to eliminate data from the digital device or other electronic
25 storage media;

26 f. evidence of the times the digital device or other electronic storage
27 media was used;

28 g. passwords, encryption keys, and other access devices that may be
 necessary to access the digital device or other electronic storage
 media;

- 1 h. documentation and manuals that may be necessary to access the
2 digital device or other electronic storage media or to conduct a
3 forensic examination of the digital device or other electronic storage
4 media;
5 i. contextual information necessary to understand the evidence
6 described in this attachment.

7 8. Records evidencing the use of an Internet Protocol address to communicate
8 with Amazon.com and to record and log data, including:

- 9 a. routers, modems, and network equipment used to connect computers
10 to the Internet;
11 b. records of Internet Protocol addresses used;
12 c. records of Internet activity, including firewall logs, caches, browser
13 history and cookies, "bookmarked" or "favorite" web pages, search
14 terms that the user entered into any Internet search engine, and
15 records of user-typed web addresses.

16 **THE SEIZURE OF DIGITAL DEVICES OR OTHER ELECTRONIC STORAGE**
17 **MEDIA AND/OR THEIR COMPONENTS AS SET FORTH HEREIN IS**
18 **SPECIFICALLY AUTHORIZED BY THIS SEARCH WARRANT FOR THE**
19 **FOLLOWING LOCATIONS:**

- 20 • **Location 1:** 25628 and 25630 102nd Pl SE, Kent, Washington
21 • **Location 2:** 22710 72nd Avenue South, Suite 109, Kent, Washington
22 • **Location 3:** 20 Southwest 7th Street, Unit J, Renton, Washington
23 • **Vehicle 1:** A Grey, Mercedes Benz, "Sprinter" model transport van,
24 Washington State license plate number C20127G, VIN #
25 WD4PE8DD8GP234633

26 **NOT ONLY TO THE EXTENT THAT SUCH DIGITAL DEVICES OR OTHER**
27 **ELECTRONIC STORAGE MEDIA CONSTITUTE INSTRUMENTALITIES OF**
28 **THE CRIMINAL ACTIVITY DESCRIBED ABOVE, BUT ALSO FOR THE**
PURPOSE OF THE CONDUCTING OFF-SITE EXAMINATIONS OF THEIR
CONTENTS FOR EVIDENCE, INSTRUMENTALITIES, OR FRUITS OF THE
AFOREMENTIONED CRIMES